

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

UNITED STATES OF AMERICA

v.

:

Case No. 7:17CR00033

BOBBY NELSON COLLINS, JR.

MOTION TO SUPPRESS SEARCH AND RELATED SEIZURE OF EVIDENCE

Comes now the defendant, Bobby Nelson Collins, Jr., by counsel, and files this Motion, requesting that this Honorable Court suppress the evidence seized in relation to a search of a hotel room, at the Budget Inn Express on Orange Avenue, that was in Mr. Collins' name on or about February 17, 2017, it being alleged by this defendant that the search was conducted in violation of his rights against unreasonable searches and seizures. It is specifically alleged that the hotel room in question was registered in the name of this defendant, Bobby Collins. The government is relying on consent it was allegedly given by Ashley Green, a female encountered outside the hotel on the night in question. Mr. Collins did not on the date in question give police any authorization to enter the hotel room in question and conduct any search and/or seizure of evidence related during that search. It is respectfully represented that any consent obtained by the police and/or relied upon by the police to conduct said search was unauthorized and illegal and, accordingly, such search was conducted in violation of his rights against unreasonable searches and seizures. The defendant respectfully requests a hearing on this matter.

s/ James C. Turk, Jr.
Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that on February 19, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

s/ James C. Turk, Jr.
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